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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Part 90
of the Commission's Rules to
Adopt Regulations for
Automatic Vehicle Monitoring
Systems

PR Docket No. 93-61
RM No. 8013

REPLY COMMENTS OF
LOCATION SERVICES

1. Location Services ("LS"), by its attorneys, hereby submits its reply comments in response to various pleadings filed by the parties to the proceeding on June 29, 1993, in connection with the above-referenced Notice of Proposed Rulemaking, 8 FCC Rcd. 2502 (1993) ("NPRM"). The time to file reply comments was extended to July 29, 1993 by Order Extending Reply Comment Period, DA 93-812, released July 7, 1993.

2. As stated in its Comments, LS generally supports the Commission's proposals; however, it is concerned with various Comments filed by the Part 15 Coalition and other Part 15 equipment manufacturers and providers ("Part 15 Group").

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Part 15 Group Will Not Be Harmed

band. This proposal will allow room for growth for Part 15 use. Although it does not appear likely that LMS providers will provide interference, Part 15 users may begin to interfere with each other at some point. Therefore, it is foreseen that more Part 15 devices will be designed for use in the 2 GHz and 5 GHz bands.

6. LMS equipment can be and is presently designed to be compatible with Part 15 equipment. As demonstrated in the Pickholtz Study included with Teletrac's Comments as Volume II, Appendix 1, pages 9-10, the noise levels of Part 15 devices and other 902-928 MHz users range from 10 to 20 dB while the interference levels of co-channel LMS transmitter would be 30 to 70 dB higher than existing noise levels.

7. Therefore, it can be seen that Part 15 devices should not experience serious interference problems with LMS providers nor should they cause such problems. However, in the event that interference does arise, it is assumed that the parties will work with each other to eliminate it.

8. Accordingly, the efforts of the Part 15 Group to return to status quo ante and to establish an industry technical committee to develop negotiated technical rules to govern the use of this band should be denied by the Commission. There is no basis for their claims.

Exclusivity Is Necessary

9. Various commentors, including Amtech Corporation and Pinpoint Communications, Inc., state that the Commission should require sharing of both wideband pulse-ranging and narrowband LMS systems in the 902-928 MHz Band. LS disagrees and supports the FCC proposal of a dichotomy between wideband and narrowband systems.

10. However, in order to further the Commission's goals for a "competitive and dependable environment in which AVM systems can continue to develop"^{1/} (Emphasis Added), LS reiterates that co-channel interference should be avoided if wideband systems are to realize practical cost/performance constraints and technical system performance objectives. Exclusive use in the 8 MHz wideband would provide an opportunity to minimize cost of network and mobile LMS equipment while maximizing both location accuracy and system capacity. LS submits that exclusivity is necessary to avoid interference on the basis that interference is proportional to the technology used and accordingly, different technologies could produce unacceptable interference to existing operators.

11. In conclusion, Location Services urges the Commission to deny the requests of the Part 15 group, to grant the proposal to separate wideband and narrowband

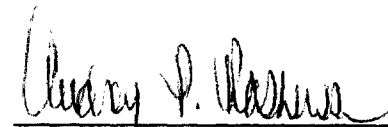
^{1/} NPRM at Para. 5.

systems and to adopt regulations that provide for exclusivity for the wideband systems.

Respectfully submitted,

LOCATION SERVICES

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Dated: July 29, 1993

CERTIFICATE OF SERVICE

I, Gladys L. Nichols, do hereby certify that on this 29th day of July, 1993, the foregoing **REPLY COMMENTS OF LOCATION SERVICES** was served to the following persons by First Class Mail:

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